

REMARKS

Claims 21-35 are all the claims pending in the application. Claim 21 is the only independent claim. Claims 21-24 and 31-33 presently stand rejected.

Allowable Subject Matter

Claims 25-30,34 and 35 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. Applicant hold in abeyance the rewriting of the claims in independent form until the Examiner has had a chance to consider the remarks below with respect to independent claim 21.

Claim Rejection Under 35 U.S.C. § 102

Claims 21 and 31-33 are rejected under 35 U.S.C. § 102(b) as being anticipated by Zampini (US 5,647,243).

Claim 21

Applicant respectfully traverses the §102 rejection of claim 1 at least because Zampini does not disclose all of the claim's recitations. For example, Zampini does not disclose the claimed machine, including a movable unit which carries the tool-carrying unit and *is slidably mounted* on the supporting structure along a first direction; and a mechanism for *converting the rotational movement of the first driving shaft into the translational movement of the movable unit*, wherein said mechanism comprises a first engagement surface arranged to co-operate with an outline of the first cam member to bring about a first working movement of the movable unit.

Zampini discloses a first hemming tool 5 that is movable between a rest position (FIG. 6) and a work position (FIG. 7) *by a rotation* of the supporting member 7 around axis O,¹ while the second hemming tool 10 is *rotatably mounted* around axis X between a rest position (Figure 8) and a work position (Figure 10).² Thus, neither of Zampini's hemming tools can reasonably correspond to the recited movable unit which is slidably mounted (i.e., translational movement) on the supporting structure because the hemming tools 5, 10 are rotatably mounted. Likewise, Zampini cannot disclose any structure that could reasonably correspond to a machine having a motion converting mechanism for *converting the rotary movement* of a driving shaft into the translational movement of the tool-carrying unit because Zampini does not have a tool-carrying unit configured to carry out a translational or sliding movement along a given direction.

Moreover, Zampini does not disclose the feature that the engagement surface with which the cam member of the motion converting mechanism cooperates is provided by the workpiece-carrying structure. That is, Zampini's cam-following rollers 7c and 7d, which cooperate with the cams 7e and 7f, respectively, are carried by the tool-carrying unit 7 associated with the first tool 5, while the cam-following rollers 11e cooperating with the cams 11f are carried by the tool-carrying unit 11 associated with the second tool 10. Therefore, none of the cam-following rollers of Zampini is carried by *the workpiece-carrying structure* and hence the workpiece-carrying structure cannot provide any engagement surface cooperating with the cam member of the motion converting mechanism.

¹ See Zampini at 4:34-36.

² See Zampini at 5:46-48 & 6:37-42.

Thus, Applicant respectfully requests the Examiner to withdraw the §102 rejection of independent claim 21.

Claims 31-33

Applicant respectfully requests the Examiner to withdraw this rejection of dependent claims 31-33 at least because of their dependency from claim 21.

Claim Rejection Under 35 U.S.C. § 103

Claims 21-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dorsett (US 5,050,422) in view of Zampini.

Claim 21

Applicant respectfully traverses the §103 rejection of claim 1 at least because the claimed machine would not have been obvious in view of any reasonable combination of Dorsett and Zampini. For example, there is no reasonable combination of Dorsett and Zampini that would meet all of the recitations of the claimed machine, including a movable unit which carries the tool-carrying unit and *is slidably mounted* on the supporting structure along a first direction; and a mechanism for converting the rotational movement of the first driving shaft into the translational movement of the movable unit, wherein said mechanism comprises a first engagement surface arranged to co-operate with an outline of the first cam member to bring about a first working movement of the movable unit.

As discussed above with respect to the §102 rejection, Zampini does not disclose these features. Moreover, Dorsett also does not disclose these features.

Dorsett discloses a tool-carrying unit 7, on which the bending tool 6 is mounted, that is rotatably supported on the supporting structure or stand 1 by means of a journal pin 9.³ Thus, Dorsett's tool carrying unit 7 cannot reasonably correspond to the recited movable unit which is slidably mounted (i.e., translational movement) on the supporting structure because the tool carrying unit 7 is instead rotatably mounted. Likewise, Zampini cannot disclose any structure that could reasonably correspond to a machine having a motion converting mechanism for *converting the rotary movement* of a driving shaft into the translational movement of the tool-carrying unit because Dorsett does not have a tool-carrying unit configured to carry out a translational or sliding movement along a given direction.

Moreover, Dorsett does not disclose the feature that the engagement surface with which the cam member of the motion converting mechanism cooperates is provided by the workpiece-carrying structure. Instead, as shown in FIGS. 1-4 of Dorsett, camming surfaces 26a, 26b of Dorsett's camming device 25 merely cooperates with the lateral surface of the cam-following roller 27 which is carried by the tool-carrying unit 7, and not by the workpiece-carrying structure 3.

Thus, Applicant respectfully requests the Examiner to withdraw the §103 rejection of independent claim 21.

Claims 22-24

Applicant respectfully requests the Examiner to withdraw this rejection of dependent claims 22-24 at least because of their dependency from claim 21.

³ See Dorsett at FIG. 1 &

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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